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May 3, 2004

LeBeouf Bros. Towing Co., Inc.

Docket Management Facility
(USCG-2003-14472/MARAD-2003-15171)

P.O. Box 9036
Houma, Louisiana 70361
(985) 594-6691
FAX: (985) 594-5253

U.S. Department of Transportation
Room PL-401
400 Seventh Street N.W.
Washington, D.C. 20590-0001

USCG-2003-14472-28

MARAD-2003-15171-30

Gentlemen:

We are a mid-sized inland towboat and petroleum barge operating company based in Houma, LA. We employ approximately 145 people in our marine operations and 60 in our adjoining shipyard.

Since 1995 we have built and purchased petroleum tank barges in excess of \$46,800,000 and towboats in excess of 6,000,000.

We made these investments based on the demand for our services, and the requirements imposed on us by OPA90. We relied then and continue to rely on the integrity of the Jones Act.

This investment and the health of our company will be at risk unless and until the rulemaking of the Jones Act is completed in a way that preserves the U.S. Ownership requirements of the cabotage laws.

Because we are a family owned corporation and rely on mostly conventional financing we can only build new equipment at a pace consistent with the economy of our nation. If corporations of foreign governments can get into our already saturated markets because of the loop-hole of charter-back arrangements this would be devastating to our company and our 207 employees.

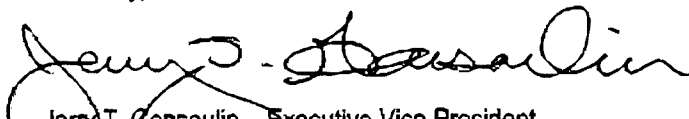
We strongly support the comments made by AWO and the Maritime Cabotage Task Force.

Please adopt Alternative 2 of their report. Charter-back arrangements for the carriage of proprietary cargo should be reviewed by MARAD to insure that this exception is properly administered. A three year limit on the grandfather provisions is also adequate for existing vessel owners to restructure their investment to ensure compliance.

Please further insure that the Coast Guard has access to the expertise it needs to evaluate the applications for documentation, to ensure that they meet the standards of the regulations.

Ending this loop-hole is critical to my company and our nation. Thank you for the opportunity to comment on this NPRM.

Sincerely,


Jerry T. Consoulin - Executive Vice President
LeBeouf Bros. Towing Co., LLC